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REMARKS

Reconsideration of this application as amended is respectfully requested.

In the Office Action, claims 1-14 were pending and rejected. In this response, no claim has been canceled. Claims 1 and 10 have been amended. No new matter has been added.

Claims 10-14 have been rejected under 35 U.S.C. 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. In view of the foregoing amendments, it is respectfully submitted that the rejection has been overcome.

Claims 1-5 and 10-14 were rejected under 102(e) as being anticipated by U.S. Patent No. 6,332,198 to Simons, et al. ("Simons"). Applicant hereby reserves the right to swear behind Simons. In view of the foregoing amendments, it is respectfully submitted that claims 1-5 and 10-14 as amended include limitations that are not disclosed by Simons.

Specifically, for example, independent claim 1 as amended includes fixing a logical identifier for a signal line at an input of an ETSI on the egress side of a line card and having a translation module coupled to the ETSI to remap another physical signal line (e.g., protection line) to the same logical identifier in response to a failure of a primary physical line (e.g., working line), such that signals arriving at the working line or protection line would end up with the same logical egress identifier. It is respectfully submitted that the above limitations are absent from Simons, particularly, the specific structure of the ETSI in combination of the translation module, as well as their functionalities.

Therefore, independent claim 1 is not anticipated by Simons. Independent claim 10 includes limitations similar to those recited in claim 1. Thus, for reasons similar to those discussed above, it is respectfully submitted that claim 10 is not anticipated by Simons. Given

claims 2-5 and 11-14 depend from one of the independent claims 1 and 10, it is respectfully submitted that claims 2-5 and 11-14 are not anticipated by Simons.

Claims 6-9 were rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 7,130,276 to Chen, et al. ("Chen"), in view of U.S. Patent No. 6,606,302 to Delattre, et al. ("Simons").

Chen was filed May 31, 2001 and was issued October 31, 2006, which was after the filing date of the present application. Chen has been assigned to the same assignee of the present application. It is respectfully submitted that the subject matter and the claimed invention were, at the time the claimed invention was made, owned by the same person or subject to an obligation of assignment to the same person. As a result, Chen is not prior art with respect to the present invention as claimed under 35 U.S.C. 103(c). Withdrawal of the rejections is respectfully requested.

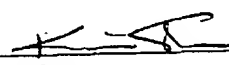
In view of the foregoing, Applicant respectfully submits the present application is now in condition for allowance. If the Examiner believes a telephone conference would expedite or assist in the allowance of the present application, the Examiner is invited to call the undersigned attorney at (408) 720-8300.

Please charge Deposit Account No. 02-2666 for any shortage of fees in connection with this response.

Respectfully submitted,

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